

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Christin Ambrocia Myles,	)	
	)	<b>13 Civ. 8096 (GBD)(RLE)</b>
Plaintiff,	)	
	)	<b>Defendant's Notice of Defendant's</b>
vs.	)	<b>Combined Motions in Limine</b>
	)	
Brandon Marshall,	)	
	)	
Defendant.	)	

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**PLEASE TAKE NOTICE**, that upon Defendants' Combined Motions *in Limine* dated January 4, 2016 and the exhibits annexed thereto, and upon all the pleadings and prior proceedings herein, the undersigned will move this Court on January 26, 2016, at 12:00 pm, before the Honorable George B. Daniels, United States District Judge, Southern District of New York, at the Courthouse thereof, 500 Pearl Street, New York, New York, the date set for the telephonic pre-trial conference, for an Order granting the following Motions in Limine:

- I. Motion in Limine to exclude evidence of Defendant's borderline personality disorder;
- II. Motion in Limine to exclude evidence of Defendant's prior arrests, and violations of NFL codes of conduct;
- III. Motion in Limine to exclude evidence related to any treatment or care provided to Defendant while he participated in NFL mandated programs related to the foregoing incidents;
- IV. Motion in Limine to exclude Plaintiff's medical records and bills (including the documents attached as exhibits);

- V. Motion in Limine to exclude evidence related to medical causes for claimed injuries including “photophobia,” “diplopia,” “disrupted sleep,” “distorted vision,” “sensitivity to light,” neck pain, and back pain;
- VI. Motion in Limine to exclude evidence of Plaintiff’s claim for damages associated with leaving New York as a result of “media attention.”
- VII. Motion in Limine to exclude evidence of costs and expenses related to bringing this case including travel costs, missed time from work, costs associated with “legal assistance”
- VIII. Motion in Limine to exclude evidence of Plaintiff’s claim for damages associated with alleged future medical treatment
- IX. Motion in Limine to exclude evidence of or related to an alleged voicemail message.

Dated: New York, New York

January 4, 2016

Dated this 4th day of January, 2016.

Respectfully Submitted,

/s/ Jason C. Astle  
Jason C. Astle  
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